



Eric Eisenberg <ericeis@gmail.com>

Request for Extension of Time

Anthony Iannarelli <anilaw2@gmail.com>

Sat, Feb 24, 2024 at 10:28 AM

To: Eric Eisenberg <ericeis@gmail.com>

Cc: Genan Zilkha <gzilkha@law.nyc.gov>, "Devine, Kerri A. (Law)" <kdevine@law.nyc.gov>

Mr. Eisenberg, I've lost count of the number of times you have refused to consent to any reasonable request for an adjournment. So the answer is no. Further, the relief that you request has nothing to do with the matter at bar. More significantly, you have complained numerous times to the court that you are opposed to adjournments because you "do not want the case delayed."

I strongly suggest, once again, that you retain counsel. Anthony Iannarelli

On Fri, Feb 23, 2024 at 5:32 PM Eric Eisenberg <ericeis@gmail.com> wrote:

Apologies, "March 27, 2024" should be "March 28, 2024."

On Fri, Feb 23, 2024 at 5:21 PM Eric Eisenberg <ericeis@gmail.com> wrote:

Dear Mr. Iannarelli, Ms. Zilkha and Ms. Devine,

I am writing to request your consent to a second extension of time of 28 days, until March 27, 2024, to file my reply as to the motion to dismiss, for two major reasons.

First, the prior extension was in part for me to obtain a response to my FOIL request to OATH which I believe may further indicate the extent of communications between OATH and Plaintiffs or their representatives. This would tend to further contradict facts newly alleged in Plaintiffs' Opposition as to OATH being a "phantom" that does not respond to correspondence. I continue to await a substantive response from OATH to that FOIL request. I have twice written to counsel for the City Defendants, including Ms. Zilkha who I understand is an attorney for OATH in at least one other matter, inquiring as to the status of the FOIL response, but I have not received an update in response to either inquiry.

Second, in light of the grant on February 23, 2024 of a 30 day extension of time to Plaintiffs to oppose the City Defendants' Motion to Dismiss, I do not believe my requested extension would appreciably delay complete briefing on the Motions to Dismiss and thus would not appreciably delay final resolution of this matter.

Please advise.

Sincerely,
Eric Eisenberg

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Anthony N. Iannarelli Jr.
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